

REMARKS

Independent claims 1, 51, and 81-83 are currently amended. Support for these amendments can be found throughout the originally filed application, including at least at paragraph [0037] and the originally filed figures. No new matter is added.

Applicants continue to maintain that Brown does not describe another axis (holding axis) about which the spool or wire holder can rotate that is at a different from the axis associated with cylindrical support 15 (reel axis), and hence does not describe both a reel axis and a holding axis, as recited in the claims. Nevertheless, to expedite prosecution, Applicants amend the claims to reiterate that the holding axis is oriented at a non-zero angle with respect to the reel axis. Brown fails to disclose the limitation of the holding axis being oriented at a non-zero angle with respect to the reel axis. Brown discloses only one support axis (15), about which a wire spool can rotate freely. See Figure 1. The Office Action alleges that the holding axis and reel axis are "the same or essentially aligned axes" in Brown, namely the axis of rotation of shaft 18. However, because Brown's axes are the "same" or "aligned," they are not oriented at a non-zero angle with respect to each other, as required in claim 1. Accordingly, Brown fails to describe or suggest each and every element of amended claim 1.

For at least these reasons, Applicants respectfully request reconsideration and withdrawal of the 35 U.S.C. § 102(b) rejection of claim 1. Amended independent claims 51 and 83 disclose limitations similar to those of amended independent claim 1. Therefore, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(b) rejections of these claims. Since claims 3, 5-9, 11, and 53 each depend from one of claims 1 and 51 and add further limitations thereto, Applicants respectfully request withdrawal of the 35 U.S.C. § 102(b) rejections of these dependent claims as well.

Sticht and Otzen fail to bridge the gap and make up for the lack of teaching in Brown. As with Brown, Sticht and Otzen do not contemplate a holding axis different from the reel axis. Therefore, Brown, Sticht, and Otzen, alone or in combination, fail to teach the subject matter of claims 1, 51, 81 and 82. Since claims 17, 22, 23, 28, 33-34, 59, 64-65, 70, and 75-76 each depend

from one of claims 1 and 51 and add further limitations thereto, Applicants respectfully request reconsideration and withdrawal of the 35 U.S.C. § 103(a) rejections of these dependent claims over Brown and Sticht.

In view of the above amendment, Applicants believes the pending application is in condition for allowance.

We believe we have appropriately provided for fees due. However, if there are any other fees due in connection with the filing of this submission, please charge the fees to our Deposit Account No. 18-1945, under Order No. SMCY-P01-101 from which the undersigned is authorized to draw.

Dated: June 25, 2010

Respectfully submitted,

By /Vasanth Sarathy/
Vasanth Sarathy
Registration No.: L0365
ROPES & GRAY LLP
One International Place
Boston, Massachusetts 02110
(617) 951-7000
(617) 951-7050 (Fax)
Agent For Applicants